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August 16, 1995

Certified Mail

Mr. Galen Tritt
Washington Department of Ecology, Northwest Regional Office
3190 160th Avenue S. E.
Bellevue, WA 98008-5452

Re: Notification of Pier 91 Facility Final Closure
and Summary of Closure Activities to Date

Dear Mr. Tritt:

During the past few months, Burlington Environmental Inc. (dba Philip Environmental) has been in the process of eliminating operations at the Pier 91 Facility. Tank 164, the remaining dangerous waste tank, was decontaminated and removed from the facility on July 19, 1995. Ecology has informed Philip that the removal of Tank 164 should have triggered the closure notification requirements of WAC 173-303-610(3)(c)(i). Accordingly, Philip should have notified Ecology on July 5, 1995, of our intent to begin final closure procedures at the facility.

Philip's intent to close the Pier 91 Facility was conveyed to Ecology on several occasions, including a meeting on July 14, 1995. However, since these discussions did not meet the requirement for formal notification of closure, Philip is hereby notifying Ecology of our intent to close the Pier 91 facility. We sincerely apologize for any confusion this oversight may have caused.

In the interest of updating and clarifying the closure status of the facility, the following is a summary of closure activities that have been conducted to date, the applicable closure mechanism for each activity, and the items that remain to be addressed:

Items closed under Interim Status Closure Plan:

- Black Oil Yard tanks (90 through 92)
- Black Oil Yard concrete top surface
- MDO Yard tanks (93 through 104)
- MDO Yard concrete top surface
- Small Yard tanks (105 through 118)
- Small Yard concrete top surfaces (105-108 area, 113-118 area)

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Items not addressed in Interim Status Closure Plan:

- Small Yard tank 164
- Small Yard concrete top surface (109-112 and 164 area)
- Load/Unload pad concrete top surface

Items to be addressed under appropriate corrective action mechanisms:

- Subsurface contamination (soil, groundwater, and concrete containment structures)

The Pier 91 Facility Part B Closure Plan is being revised to accurately reflect current facility operations. The revised plan will be submitted as a formal permit modification request by September 1, 1995.

Thank you for your assistance in working out the complex details of this facility closure. If you have any questions, please call me at (206) 227-6121, or Keith Lund at (206) 227-7527.

Sincerely,



John Stiller
Regulatory Affairs Manager

cc: Gerald Lenssen, Ecology HQ
Dave Bartus, EPA Region 10